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*Attorneys for Plaintiffs and the Proposed Class*

**UNITED STATES DISTRICT COURT  
FOR THE CENTRAL DISTRICT OF CALIFORNIA**

SHANNON MASSER DOWNS, M.B.,  
a minor, by and through her legal  
guardian, Shannon Masser Downs, and  
MARIA HINESTROSA, individually,  
and on behalf of all others similarly  
situated,

Plaintiffs,

v.

REGAL MEDICAL GROUP, INC.,  
LAKESIDE MEDICAL  
ORGANIZATION, A MEDICAL  
GROUP, INC., AFFILIATED  
DOCTORS OF ORANGE COUNTY  
MEDICAL GROUP, INC., and  
GREATER COVINA MEDICAL  
GROUP, INC.

Defendants.

Case No. 2:23-cv-01507-AB-SP

**PLAINTIFFS' NOTICE OF  
VOLUNTARY DISMISSAL  
WITHOUT PREJUDICE**

1 PLEASE TAKE NOTICE THAT pursuant to Rule 41(a)(1)(A)(i) of the Federal  
2 Rules of Civil Procedure, Plaintiffs Shannon Masser Downs, and M.B., a minor, by  
3 and through her legal guardian Shannon Masser Downs, and Maria Hinestrosa  
4 (collectively, "Plaintiffs"), hereby dismiss without prejudice all causes of action in  
5 the Class Action Complaint ("Complaint"). Defendants have not filed an Answer to  
6 the Complaint or a Motion for Summary Judgment in this action.

7  
8 Date: March 14, 2023

Respectfully Submitted,

9 By: /s/ Pavithra Rajesh

10 Jonathan M. Rotter (SBN 234137)

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